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Hon. Franklin D. Burgess

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in The U.S.
DISTRICT COURT at Seattle, Washington.

MARCH 27, 2003
BRUCE MIFKIN, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v

MICHAEL AARON WILSON,

Defendant.

NO. CR02-6065FDB

SUPERSEDING INDICTMENT



CR 02-6065 #035

THE GRAND JURY CHARGES THAT

COUNT 1

(Production of Visual Depictions of Minors Engaged in Sexually Explicit Conduct)

At an exact time unknown but beginning on or about January 2002 and continuing until on or about June 2002, in Clark County, within the Western District of Washington, MICHAEL AARON WILSON, who has previously been convicted in 1988, in Brazoria County Court, Texas, for Possession of Child Pornography, Case Cause Number 56283M, did knowingly employ, use, persuade, induce, entice and coerce a minor male, John Doe, age 17, date of birth June 20, 1984, to engage in sexually explicit conduct as that term is defined by Title 18, United States Code,

55

1 Section 2256(2) for purposes of producing visual depictions of such conduct, the visual
2 depictions being produced with materials that have been mailed, shipped, and
3 transported in interstate or foreign commerce and the visual depictions having actually
4 been transported in interstate or foreign commerce by computer through the Internet.

5 All in violation of Title 18, United States Code, Sections 2251(a) and (d).

6 **COUNT 2**

7 **(Coercion and Enticement)**

8 Between on or about January 2002 and June 2002, in Clark County, within the
9 Western District of Washington, MICHAEL AARON WILSON, who has previously
10 been convicted in 1988, in Brazoria County Court, Texas, for Possession of Child
11 Pornography, Case Cause Number 56283M, did use the Internet, a facility and means
12 of interstate or foreign commerce, to knowingly persuade, induce, entice and coerce an
13 individual under the age of 18 years, that is John Doe, age 17, date of birth June 20,
14 1984, to engage in a sexual activity for which any person may be charged with a
15 criminal offense, specifically, Title 18, United States Code, Section 2251(a),
16 production of visual depictions of minors engaged in sexually explicit conduct.

17 All in violation of Title 18, United States Code, Sections 2422(b), 2426 and
18 2427

19 **COUNT 3**

20 **(Transport of Visual Depictions of Minors Engaged in Sexually Explicit Conduct)**

21 Between on or about January 2002 and June 2002, in Clark County, within the
22 Western District of Washington, MICHAEL AARON WILSON, who has previously
23 been convicted in 1988, in Brazoria County Court, Texas, for Possession of Child
24 Pornography, Case Cause Number 56283M, did knowingly transport and ship in
25 interstate and foreign commerce by computer visual depictions, the production of which
26 involved the use of a minor engaged in sexually explicit conduct as that term is defined

27
28 Superseding Indictment/Wilson - 2
UNITED STATES ATTORNEY
601 Union Street, Suite 5100
Seattle, Washington 98101-3903
(206) 553-7970

1 by Title 18, United States Code, Section 2256(2), and which visual depictions were of
2 such conduct

3 All in violation of Title 18, United States Code, Section 2252(a)(1) and (b).

4 **COUNT 4**

5 **(Possession of Visual Depictions of Minors Engaged in Sexually Explicit Conduct)**

6 Beginning at an exact time unknown, but not earlier than January 2000, and
7 continuing through on or about September 5, 2002, in Clark County, within the
8 Western District of Washington, MICHAEL AARON WILSON, who has previously
9 been convicted in 1988, in Brazoria County Court, Texas, for Possession of Child
10 Pornography, Case Cause Number 56283M, did knowingly possess a computer hard
11 drive which contains visual depictions that have been mailed, shipped or transported in
12 interstate or foreign commerce, and which were produced using materials which have
13 been mailed, shipped or transported in interstate and foreign commerce, and which
14 visual depictions were of minors engaged in sexually explicit conduct, and the
15 production of such visual depictions involved the use of minors engaging in sexually
16 explicit conduct.

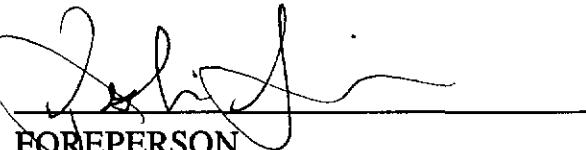
17 All in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b).

18 **ALLEGATION OF FORFEITURE**

19 The allegations of Count 1 through 4 are hereby realleged and incorporated
20 herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United
21 States Code, Section 2253(a). Upon conviction of any of the offenses alleged in Counts
22 1 through 4, MICHAEL AARON WILSON shall forfeit to the United States
23 immediately all of his right, title and interest in any and all property, real or personal,
24 that was used, or was intended to be used, to commit or to promote the commission of
25 the charged offenses, and any visual depiction as described in Title 18, United States
26 Code, Sections 2251 and 2252, which was produced, transported, mailed shipped or

1 a One full tower custom built CPU without a serial number, containing
2 three hard drives with the following respective serial numbers:
3 WMA8C1183690, WMA8E1331380, and WMA9F1006941
4 All in violation of Title 18, United States Code, Section 2253(a).

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6 TRUE BILL Yes
7 DATED: 3/27/03
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16 FOREPERSON
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20 JOHN MCKAY
21 United States Attorney
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25 SUSAN HARRISON
26 Assistant United States Attorney
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30 KATHERYN KIM FRIERSON
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